

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

Vantage Financial Services, Inc.  
Plaintiff

v.

Nonprofit Service Group, Inc. and George E.  
Miller  
Defendant

CIVIL ACTION NO. 04-11686WGY

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AFFIDAVIT OF MATTHEW J. GRIFFIN

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I, Matthew J. Griffin, depose and state as follows:

1. I am an attorney licensed to practice law by the Commonwealth of Massachusetts.

I am counsel for Defendants in the above-captioned case. I submit this affidavit in support of Defendant's Motion for Summary Judgment.

2. Attached hereto as Exhibit A is a true and accurate copy of the Complaint in this action along with Exhibit A thereto, "Agreement to Provide Fund Raising Consulting and Management Services."

3. Attached hereto as Exhibit B is a true and accurate copy of excerpts of the March 15, 2002 deposition transcript of Harry Melikian which was produced by the plaintiff during discovery and bears the Bates Nos. Vantage 20758-Vantage 20814.

4. Attached hereto as Exhibit C is a true and accurate copy of the October 16, 2001 deposition transcript of Henry Lewis which was produced by the plaintiff during discovery and bears the Bates Nos. Vantage 20666-Vantage 20715.

5. Attached hereto as Exhibit D is a true and accurate copy of excerpts of the November 15, 2000 deposition transcript of Mary Lou (Newman) Giannasoli.

6. Attached hereto as Exhibit E is a true and accurate copy of excerpts of the September 28, 2000 deposition transcript of Jay Elliot Gelb.

7. Attached hereto as Exhibit F is a true and accurate copy of the February 20, 2002 deposition transcript of Dallas Ray Graves which was produced by the plaintiff during discovery and bears the Bates Nos. Vantage 20716-Vantage 20756.

8. Attached hereto as Exhibit G is a true and accurate copy of Exhibit 1 to the September 28, 2000 deposition of Jay Elliot Gelb.

9. Attached hereto as Exhibit H is a true and accurate copy of the Complaint of the United States 1998 in Civil Action No. 97-10052-MLW dated July 20, 1998.

10. Attached hereto as Exhibit I is a true and accurate copy of excerpts of the deposition transcript of the 30(b)(6) deposition of Vantage Financial Services, Inc. by Harry Melikian, designee, dated June 17, 2005 along with true and accurate copies of Exhibits No. 7 (October 25, 2000 letter to John VerMaas et. al. from Lawrence C. Lyon) and 35 (March 1, 2001, letter to Brian W. LeClair, Esq. from Peter K. Levitt) thereto.

11. Attached hereto as Exhibit J is a true and accurate copy of a June 15, 2000 letter from Harry Melikian to Jay Fleisher which was produced by the Shriners Hospitals for Children during the course of discovery and bears the Bates Nos. SHC 04604-SHC 04605.

12. Attached hereto as Exhibit K is a true and accurate copy of a September 7, 2000 letter from Jay Fleisher to Morris Goldings which was produced by the Shriners Hospitals for Children during the course of discovery and bears the Bates Nos SHC 00948-SHC 00950.

13. Attached hereto as Exhibit L is a true and accurate copy of a September 21, 2000 letter to Jay Fleisher from Brian W. LeClair which was produced by the Shriners Hospitals for Children during the course of discovery and bears the Bates Nos. SHC 00930-SHC 00935.

14. Attached hereto as Exhibit M is a true and accurate copy of a September 29, 2000 letter from Jay Fleisher to Morris Goldings which was produced by the Shriners Hospitals for Children during the course of discovery and bears the Bates Nos. SHC 00913- SHC 00917

15. Attached hereto as Exhibit N is a true and accurate copy of an October 2, 2000 letter from George E. Miller to Jay Fleisher which was produced by the Shriners Hospital for Children during the course of discovery and bears the Bates No. SHC 00912.

16. Attached hereto as Exhibit O is a true and accurate copy of Plaintiffs' Supplemental Initial Disclosure in Civil Action No. 97-10052-MLW dated October 18, 2000 which bears the Bates Nos. Vantage 18469-Vantage 18505.

17. Attached hereto as Exhibit P is a true and accurate copy of an October 25, 2002 letter to John VerMaas et. al. from Lawrence C. Lyon and attachment which were produced during the course of discovery by Shriners Hospitals for Children and bears the Bates Nos. SHC 00872; SHC 00884-00886.

18. Attached hereto as Exhibit Q is a true and accurate copy of the July 21, 2005 deposition transcript of Lawrence C. Lyon along with a true and accurate copies of Exhibit No. 7

thereto (October 25, 2002 letter to John VerMaas et. al. from Lawrence C. Lyon and attachment Bates Nos. SHC 00872; SHC 00884-00886).

19. Attached hereto as Exhibit R is a true and accurate copy of a March 2001 letter to Brian W. LeClair, Esq. from Peter K. Levitt which was produced by the plaintiff during discovery.

20. Attached hereto as Exhibit S is a bill for legal services rendered through March 31, 2001 to Harry Melikian from Mahoney Hawkes, LLP which was produced by the plaintiff during the course of discovery and bears the Bates Nos. Vantage 21762-Vantage 21767.

21. Attached hereto as Exhibit T is a true and accurate copy of a Memorandum and Order (Wolf, D.J) in Civil Action No. 97-10052-MLW dated March 5, 2004.

22. Attached hereto as Exhibit U is a true and accurate copy of Plaintiff's Responses to Defendants' First Request for Admissions.

23. Attached hereto as Exhibit V is a true and accurate copy of a spreadsheet dated February 17, 2003 which was produced by plaintiffs during discovery and bears the Bates No. 22589.

24. Attached hereto as Exhibit W is a true and accurate copy of excerpts of the August 9, 2005 deposition transcript of Lawrence C. Lyon along with a true and accurate copy of Exhibit 21 thereto (spreadsheet dated February 17, 2003 , Bates No. 22589).

25. Attached hereto as Exhibit X is a true and accurate copy of Plaintiff's Initial Disclosures.

Signed under the pains and penalties of perjury this 29th day of September, 2005.

/s/ Matthew J. Griffin  
Matthew J. Griffin, Esquire

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